

Message

From: Dykes, Teresa [Dykes.Teresa@epa.gov]
Sent: 3/19/2018 6:05:24 PM
To: Chapman, Apple [Chapman.Apple@epa.gov]
Subject: Summary of Call on OIAI and PTE

Much of the call was spent grounding on PTE and FE/enforce as practical matter. The call ended up with Peter seeing three issue areas that will need to be briefed up.

1. Def'n of PTE and whether in the rule WP will allow non-FE limits that are enforceable as a practical matter to dictate a source's PTE.
2. Whether allowing a source to take a limit less stringent than the existing applicable MACT (which still reflects a PTE < major) runs afoul of the statutory limit of all existing sources to meet the MACT floors (I call this the OIAI MACT Limit- akin to the OIAI BACT limit).
3. Whether allowing a source to take a less stringent limit messes up what we have said or how we have met other areas of the CAA- e.g., urban toxics, 90% goals.

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